

Kathleen B. Levitz
Vice President-Federal Regulatory

EX PARTE OR LATE FILED

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February 2, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 12th St. S.W.
Washington, D.C. 20554

RECEIVED

FEB - 2 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Written Ex Parte in CC Docket No. 98-56 and CC Docket No. 98-121

Dear Ms. Salas:

This is to inform you that BellSouth Corporation has made a written ex parte to Dr. Daniel Shiman of the Common Carrier Bureau's Policy and Program Planning Division. That ex parte consists of a copy of BellSouth's December 22, 1998, filing in the Louisiana Public Service Commission's Docket No. U-22252-Subdocket C. This information has been submitted in response to Dr. Shiman's request.

Pursuant to Section 1.1206(a)(1) of the Commission's rules, I am filing two copies of this notice and that written ex parte presentation in both the dockets identified above. Please associate this notification with the record in both those proceedings.

Sincerely,



Kathleen B. Levitz
Vice President - Federal Regulatory

Attachment

cc: Daniel Shiman (w/o attachment)
Andrea Kearney (w/o attachment)

No. of Copies rec'd
LIST ABOVE

013

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Vice President-Federal Regulatory

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

Dr. Daniel Shiman
Policy and Program Planning Division
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

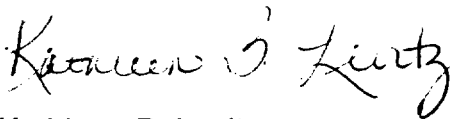
Written Ex Parte in CC Docket No. 98-121

Dear Dr. Shiman:

Attached is the copy of BellSouth's December 22, 1998 Filing in the Louisiana Public Service Commission's proceeding LPSC Docket Number U-22252-C that you requested. If after reviewing this attachment you conclude that you need additional information, please call me at (202) 463-4113.

In compliance with Section 1.1206(a)(1) of the Commission's rules, I have today filed with the Secretary of the Commission two copies of this written ex parte presentation for both CC Docket No. 98-56 and CC Docket No. 98-121 and requested that it be associated with the record of both dockets.

Sincerely,



Kathleen B. Levitz
Vice President -Federal Regulatory
Attachment

cc: Ms. Andrea Kearney



BellSouth Telecommunications, Inc. 504 528-2050
Suite 3060 Fax 504 528-2948
365 Canal Street
New Orleans, Louisiana 70130-1102

Victoria K. McHenry
General Counsel - LA

December 22, 1998

RECEIVED

FEB - 2 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA FEDERAL EXPRESS

Ms. Susan Cowart
Louisiana Public Service
Commission
P. O. Box 91154
Baton Rouge, LA 70821

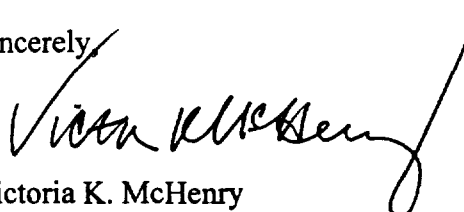
RE: LPSC Docket Number U-22252-C
Louisiana Public Service Commission, ex parte
In re: BellSouth Telecommunications, Inc.
Service Quality Performance Measurements

Dear Ms. Cowart:

Enclosed please find the original and one (1) copy of BellSouth's December 22, 1998 Filing to be filed into the record of the referenced matter. An additional copy is enclosed which we ask that you date stamp and return in the envelope provided. We are federal expressing this filing this date with the permission of Stephanie Folse, Staff Attorney.

Merry Christmas to all, and please God, don't make me file anything else this year!

Sincerely,



Victoria K. McHenry

VKM:lda
Enclosures

cc: Official Service List (w/enc)(U.S. Mail or Fed. Exp.)

Doc #145467

In Re: BellSouth Telecommunications, * Docket U-22252
Inc. Service Quality Performance * Subdocket C
Measurements *

The LPSC's General Order dated August 31, 1998 (U-22252 Subdocket C) provides that the Commission will establish performance benchmarks only where no retail analog exists. BellSouth was ordered to utilize special studies of its internal operations to establish the benchmark performance level and to rely on experiences drawn from its own operations. The General Order further provided that these studies and their associated methodology would be further refined over the next six months in workshops.

At the first status conference, the parties discussed the fact that there was no consensus on which of the Commission's performance measurements had a retail analog and, therefore, no consensus on which measures may require development of a benchmark study. Accordingly, the procedural schedule was set to accommodate discussion of this issue in October and the possible need for a Commission ruling. The deadline for the filing of proposed benchmarks was postponed by agreement from November 30, 1998, the date set forth in the order, until December 11, 1998 (recently extended until December 22, 1998).

At the October technical conference, BellSouth submitted a matrix setting forth its position as to which measures have retail analogs and which do not. The matrix reflects that there are no retail analogs for FOCs, rejects and jeopardies, UNE and collocation measures. At the conference, Jerry Moore agreed to study the issue of whether surrogate analogs could be created for the FOCs, rejects and jeopardies, and to submit the results of those studies in the December, 1998 time frame. The parties reached no agreement on whether or not retail analogs existed for UNEs. BellSouth submitted that the real issue -- whether discussed in terms of benchmarks, analogs, surrogates, intervals or objectives --

is what is a reasonable interval of time for the ordering and provisioning of UNEs.

BellSouth further submitted that its target intervals allow for a reasonable period of time, and that it would demonstrate support for this position at the November 30 – December 1, 1998 workshop. This discussion was later postponed by agreement of the parties until the next workshop.

BellSouth respectfully submits that it is inappropriate, especially for provisioning of UNEs, to attempt at this time to set into stone formal benchmarks or surrogate retail analogs, especially when such standards are being considered, as they are here, as a potential basis for fines, penalties or other consequences. Acceptable levels of performance, and any attendant consequences, are best left to the individual needs of negotiating parties. One size does not and need not fit all. At the very least, any uniform standard-setting cannot be undertaken in a theoretical vacuum, but must take into account the ILEC's real world ability to provision UNEs based on its real world experience with its own systems and processes. This is not just BellSouth's position – it is the position of the FCC as well. In paragraph 125 of its Notice of Proposed Rulemaking, CC Docket No. 98-56, *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, the FCC stated:

[W]e do not believe that we have developed a sufficient record to consider proposing performance standards at this time. There is little in the current record to explain how such standards would be used as a method of evaluating compliance with statutory requirements. Moreover, any model performance standards should be grounded in historical experience to ensure that such standards are fair and reasonable. Because our present record lacks the necessary historical data, we believe that it would be premature for us to develop standards at this point. We tentatively conclude, therefore, that we should postpone consideration of performance standards until parties have had the opportunity to

consider how they would be used and have able to review actual performance data over a period of time.

Like the FCC, this Commission simply does not have the historical experience or data necessary to establish formal benchmarks that will be uniformly applicable in all cases. The experience in Louisiana as of October 31, 1998 reveals that only 767 unbundled loops have been provisioned to CLECs in the aggregate, and little, if any, activity has occurred in the provisioning of other UNEs. *See Exhibit 1*. The performance studies attached as Exhibit 2 also underscore the lack of data in these areas. The Commission should not establish formal benchmarks at this time. This will by no means leave CLECs and the Commission without recourse for ensuring BellSouth's continued non-discriminatory performance under the Act. CLECs and the Commission can continue to monitor BellSouth's performance using the performance data that is available under the Commission's service quality performance measurements, averages computed with that performance data, the raw data provided via the Internet, and BellSouth's target intervals. No other RBOC generates the volume and detail of actual service quality data that BellSouth today provides pursuant to its service quality performance measurements. This data provides a more than adequate basis for judging non-discriminatory performance under the Act, and any CLEC that believes that it has received less than it is entitled to is free to pursue enforcement action under the expedited dispute resolution procedures set up by this Commission exactly for that purpose.

Pre-Ordering and Ordering Measures BellSouth's Retail Analog Matrix states that there is no BellSouth analog available for *Percent Rejected Service Requests*, *Reject Distribution Interval and Average Interval* and *Firm Order Confirmation Timeliness ("FOC")*. As discussed more fully in Exhibit 3, no retail analog exists for

these measures. BellSouth's retail ordering systems do not return a FOC to BellSouth's service representatives. Moreover, these systems do not currently date and time stamp BellSouth data at the beginning and end of an interval that could be used as an interval for an FOC. As a result of investigation, BellSouth has learned that modifications can be made to capture and retain additional data in the appropriate systems. BellSouth will invest significant time and resources to make these modifications, and anticipates having them in place in the second quarter of 1999. As modified, BellSouth's systems will provide a date and time stamp when a BellSouth retail representative first pulls up a screen to begin taking an order from a retail customer. In the interim, BellSouth has provided averages derived from studies of its actual performance history which can serve as the basis for monitoring its continued performance and ongoing discussion of these issues.

Provisioning, Maintenance and Repair Measures BellSouth's Retail Analog Matrix shows that, with the exception of the two Jeopardy measurements, all of these measurements have a BellSouth retail analog for resold services and for BellSouth local interconnection trunks. It also reflects that BellSouth has no retail analog for these measurements for the provisioning of unbundled network elements or UNEs.

As the result of the Telecommunications Act of 1996 (the "1996 Act") and this Commission's March 15, 1996 Regulations for Competition in the Local Telecommunications Market, BellSouth was required for the first time to unbundle its network in order to provide individual network elements to competitors at wholesale prices. The provisioning of these unbundled network elements, in some cases, required BellSouth to create new processes. There are no retail analogs for these new processes.

The law recognizes that there is not always a retail analog against which to measure CLEC performance and in such cases sets the standard as a level of performance that will provide an efficient competitor a reasonable opportunity to compete. The FCC has acknowledged that “the ordering and provisioning of unbundled network elements” is an example of “functions that have no retail analogue.” *Ameritech Michigan Order*, para. 141; see also FCC’s *Memorandum Opinion and Order dated October 13, 1998, CC Docket No. 98-121, In the Matter of Application of BellSouth Corporation, et al, for Provision of In-Region, InterLATA Services in Louisiana*, at para. 87 (“For those OSS functions that have no retail analogue (such as ordering and provisioning of unbundled network elements), a BOC must offer access sufficient to allow an efficient competitor a meaningful opportunity to compete”).

Absent additional ordering activity and experience in providing unbundled network elements, it is premature and unfair to establish benchmarks for such activity, especially if the purpose of such benchmarks is to levy fines and penalties for missing the benchmarks. BellSouth proposes that the Commission use target intervals to monitor BellSouth’s performance at this time, in conjunction with averages based on BellSouth’s actual history of performance data.

BellSouth posted and distributed established target intervals for the provisioning of UNEs to CLECs some time ago. Since the date of the Commission’s August 31, 1998 General Order, BellSouth has validated its target intervals through the various product teams responsible for the particular UNE services. The revised intervals, together with a description of the process by which they were established, are attached as Exhibit 4. A flow chart of unbundled loop provisioning is attached as Exhibit 5, and a technical

reference describing those processes is annexed as Exhibit 6. Finally, and as is the case with the pre-ordering and ordering measures, BellSouth has attached studies of its actual performance history using the available data collected under these measures.

E911 and Operator Services/Directory Assistance

These performance measures do not distinguish between service to CLEC customers as opposed to service to BellSouth customers because the BellSouth systems do not distinguish between BellSouth customers and CLEC customers. Parity is thus built into the process by design.

Collocation After the October workshop, the Commission Staff directed BellSouth to check “the possibility of expedited processes for building collocation cages, or other methods of improving the target collocation intervals” and to “provide more data on the intervals needed for collocation requests and arrangement times.”

The collocation arrangement requests BellSouth has received thus far have been for varied space sizes. Because of the different space requirements CLECs appear to have, it would be difficult to prebuild cages. If the CLECs can reach a consensus on desired space sizes and arrangements, BellSouth could consider more expedited processes for prebuilding cages.

BellSouth is in the process of developing Internet access to the Expanded Interconnection Application and Firm Order Document (Form BSTEI-1-V). BellSouth has invited several customers to be a part of a Focus Group to review the documents and provide input concerning the documents and their ease of use.

Exhibit 7 sets forth the requested data on the intervals needed for collocation requests and arrangement times.

3. *Penalties, Enforcement and Dispute Resolution*

Pursuant to the December 2, 1998 Notice, BellSouth will file a brief addressing these issues on January 11, 1999.

4. *Raw Data Issues*

BellSouth will be prepared at the January Workshop to demonstrate to the CLECs how to use the raw data available to them to monitor performance results. In order to make this presentation, BellSouth will need to use the raw data of a CLEC. BellSouth requests that either MCI, AT&T and/or e.spire consent to allow BellSouth to use the raw data necessary to permit BellSouth to make its presentation. BellSouth made a presentation to AT&T on December 21, 1998 and, with AT&T's permission, BellSouth proposes to use the same material at the January workshop.

5. *Additional dates for February workshop, if necessary. Revise schedule, if necessary. Discuss the necessity for post workshop briefs.*

BellSouth anticipates that a revision to the current schedule may be necessary and will be prepared to discuss this issue at the workshop. It also encourages the Commission to accept post workshop briefs in this matter.

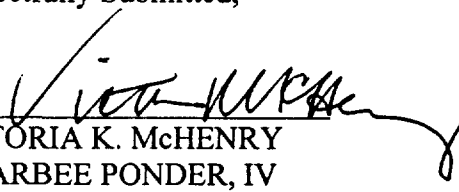
6. *Address action item list.*

The Notice also provides that any party may comment on December 22, 1998 on those action items which the party believes have not been adequately addressed, including the basis for the belief. In this connection, BellSouth attaches as Exhibit 8 its most recent service quality performance measurement report, which reflects implementation of the Commission's August 31, 1998 General Order and action items agreed upon at the October workshop.

ADDITIONAL ITEMS

The December 2, 1998 Notice permits comments from all parties regarding BellSouth's statistical presentation. BellSouth has attached as Exhibit 9 its comments concerning Dr. Colin Mallow's written critique of BellSouth's statistical analysis at the November 30 – December 1, 1998 workshop.

Respectfully Submitted,



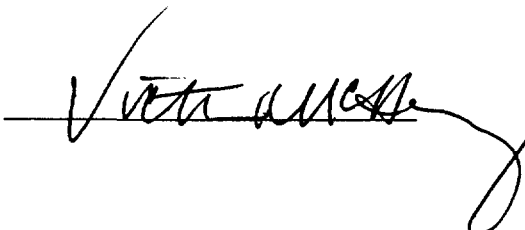
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WILLIAM J. ELLENBERG, II
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Atlanta, GA 30375
404-335-0711

Attorneys for
BellSouth Telecommunications, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served on all parties of record by telecopy or Federal Express, postage prepaid, on this the 22d day of December, 1998.



Louisiana Unbundled Network Element (UNE) Summary Report

Units in service as of October 31, 1998	Louisiana
UNBUNDLED LOOPS	767
LOOP CONCENTRATION	0
SUB LOOPS	0
NETWORK INTERFACE DEVICE	0
OPEN AIN	0
CCS7 SIGNALING TRANSPORT SERVICE (see Note #1)	13
UNBUNDLED INTEROFFICE TRANSPORT	0
O/S AND DA UNES	
• DAAS (CLEC customers)	1
• DACC (CLEC customers)	3
• DADS (CLEC customers)	9
• DADAS (CLEC customers)	0
DIGITAL CROSS CONNECT	
CUSTOMIZED CALL ROUTING	0
UNBUNDLED LOCAL SWITCHING (ports)	1
UNBUNDLED ACCESS TO OSS	
ACCESS TO DATABASES (# of queries)	
• 800 Database (see Note #2)	1,434,040,366
• LIDB (see Note #3)	815,201,297
NUMBER PORTABILITY	
• Ported Numbers - Residence	3
• Ported Numbers - Business	3589

Note #1 - CLECs directly interconnected to BST's signaling network regionwide.

Note #2 - Total CLEC and other parties queries to BST 800 database. BellSouth does not retain originator of query or point of origin.

Note #3 - Includes all queries from customers other than BellSouth's end-user customers. This number represents all nine states in the region.

LOUISIANA
REPORT: % REJECTED SERVICE REQUESTS

Measurement No. 1	NON-MECHANIZED: RESIDENCE	
	CLEC AGGREGATE	
REPORTING PERIOD	Reject Count	% Rejected Service Requests
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98	835	5.02%
Oct-98	952	6.06%
Nov-98	1165	6.84%
Dec-98		

Average 5.98%

Measurement No. 1	NON-MECHANIZED: BUSINESS	
	CLEC AGGREGATE	
REPORTING PERIOD	Reject Count	% Rejected Service Requests
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98	129	0.79%
Oct-98	163	1.04%
Nov-98	145	0.85%
Dec-98		

Average 0.91%

LOUISIANA

REPORT: % REJECTED SERVICE REQUESTS

Measurement No. 1	NON-MECHANIZED: RESALE SPECIAL	
	CLEC AGGREGATE	
REPORTING PERIOD	Reject Count	% Rejected Service Requests
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98	2	0.01%
Oct-98	0	0.00%
Nov-98	5	0.03%
Dec-98		

Average

0.02%

NOTE: NA = Not Available, file contains no raw numbers

**LOUISIANA
REPORT: % REJECTED SERVICE REQUESTS**

Measurement No. 1	NON-MECHANIZED: UNE	
	CLEC AGGREGATE	
REPORTING PERIOD	Reject Count	% Rejected Service Requests
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98	48	0.29%
Oct-98	33	0.21%
Nov-98	73	0.43%
Dec-98		

Average 0.31%

NOTE: NA = Not Available, file contains no raw numbers

**LOUISIANA
REPORT: % REJECTED SERVICE REQUESTS**

Measurement No. 1	NON-MECHANIZED: UNE	
	CLEC AGGREGATE	
REPORTING PERIOD	Reject Count	% Rejected Service Requests
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98	48	0.29%
Oct-98	33	0.21%
Nov-98	73	0.43%
Dec-98		

Average

0.31%

NOTE: NA = Not Available, file contains no raw numbers

**LOUISIANA
REPORT: % REJECTED SERVICE REQUESTS**

Measurement No. 1	NON-MECHANIZED: UNE W/ NUMBER PORTABILITY	
	CLEC AGGREGATE	
REPORTING PERIOD	Reject Count	% Rejected Service Requests
Mar-98	NA	NA
Apr-98	NA	NA
May-98	NA	NA
Jun-98	NA	NA
Jul-98	NA	NA
Aug-98	NA	NA
Sep-98	38	0.23%
Oct-98	42	0.27%
Nov-98	19	0.11%
Dec-98		

Average

0.20%

NOTE: NA = Not Available, file contains no raw numbers

**LOUISIANA
REPORT: % REJECTED SERVICE REQUESTS**

Measurement No. 1	NON-MECHANIZED: OTHER	
	CLEC AGGREGATE	
REPORTING PERIOD	Reject Count	% Rejected Service Requests
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98	538	3.23%
Oct-98	519	3.30%
Nov-98	630	3.70%
Dec-98		

Average 3.41%

NOTE: NA = Not Available, file contains no raw numbers

**LOUISIANA
REPORT: % REJECTED SERVICE REQUESTS**

Measurement No. 1	FULLY MECHANIZED: OTHER	
	CLEC AGGREGATE	
REPORTING PERIOD	Reject Count	% Rejected Service Requests
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98	1945	3.67%
Oct-98	6881	13.92%
Nov-98	0	0.00%
Dec-98		

Average 8.62%

NOTE: NA = Not Available, file contains no raw numbers

LOUISIANA
REPORT: AVERAGE REJECT INTERVAL

Measurement No. 1	NON-MECHANIZED: RESIDENCE	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Rejected	Avg Reject Interval (DAYS)
Mar-98	832	2.49
Apr-98	1064	1.43
May-98	747	1.44
Jun-98	814	1.21
Jul-98	882	1.51
Aug-98	893	1.87
Sep-98	819	1.45
Oct-98	912	1.59
Nov-98	1066	3.07
Dec-98		

Average **1.78**

Measurement No. 1	NON-MECHANIZED: BUSINESS	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Rejected	Avg Reject Interval (DAYS)
Mar-98	115	1.98
Apr-98	88	2.19
May-98	161	1.63
Jun-98	373	2.12
Jul-98	169	1.87
Aug-98	178	2.22
Sep-98	131	2.08
Oct-98	150	2.82
Nov-98	143	2.12
Dec-98		

Average **2.11**

LOUISIANA

REPORT: AVERAGE REJECT INTERVAL

Measurement No. 1	NON-MECHANIZED: RESALE SPECIAL	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Rejected	Avg Reject Interval (DAYS)
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	5	5.19
Dec-98		

Average

**LOUISIANA
REPORT: AVERAGE REJECT INTERVAL**

Measurement No. 1	NON-MECHANIZED: UNE	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Rejected	Avg Reject Interval (DAYS)
Mar-98	6	2.90
Apr-98	8	1.00
May-98	8	2.23
Jun-98	10	2.87
Jul-98	18	2.28
Aug-98	66	2.60
Sep-98	46	2.17
Oct-98	30	3.13
Nov-98	69	2.51
Dec-98		
Average		2.41

**LOUISIANA
REPORT: AVERAGE REJECT INTERVAL**

Measurement No. 1	NON-MECHANIZED: UNE W/ NUMBER PORTABILITY	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Rejected	Avg Reject Interval (DAYS)
Mar-98	2	4.44
Apr-98	10	1.68
May-98	3	4.80
Jun-98	16	1.35
Jul-98	50	2.18
Aug-98	24	3.89
Sep-98	38	2.23
Oct-98	42	5.12
Nov-98	19	2.94
Dec-98		
Average		3.18

**LOUISIANA
REPORT: AVERAGE REJECT INTERVAL**

Measurement No. 1	NON-MECHANIZED: OTHER	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Rejected	Avg Reject Interval (DAYS)
Mar-98	373	1.56
Apr-98	411	1.69
May-98	344	1.48
Jun-98	291	1.18
Jul-98	374	0.93
Aug-98	381	2.07
Sep-98	495	1.21
Oct-98	513	1.69
Nov-98	564	3.70
Dec-98		
Average		1.72

LOUISIANA
REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	FULL MECHANIZED: RESIDENCE	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	954	0.14
Apr-98	1464	0.31
May-98	1592	0.06
Jun-98	2171	0.05
Jul-98	4291	0.03
Aug-98	4514	0.05
Sep-98	5810	0.08
Oct-98	7385	0.03
Nov-98	8793	0.74
Dec-98		
Average		0.17

Measurement No. 1	FULL MECHANIZED: BUSINESS	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	26	0.25
Apr-98	72	0.50
May-98	71	0.30
Jun-98	81	0.02
Jul-98	50	0.02
Aug-98	41	0.01
Sep-98	15	0.03
Oct-98	50	0.18
Nov-98	125	2.68
Dec-98		
Average		0.44

LOUISIANA

REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	FULL MECHANIZATION: RESALE DESIGN	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		

Average

LOUISIANA

REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	FULL MECHANIZATION: UNE	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		

Average

May - November - UNE's not mechanized

LOUISIANA

REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	FULL MECHANIZATION: UNE W/ LNP	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		

Average

May - November - UNE's not mechanized

LOUISIANA

REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	FULL MECHANIZATION: OTHER	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		

Average

May - November - UNE's not mechanized

LOUISIANA

REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	NON-MECHANIZED: RESIDENCE	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	4005	0.99
Apr-98	5463	1.12
May-98	4891	1.32
Jun-98	5254	1.26
Jul-98	6178	1.32
Aug-98	6949	1.14
Sep-98	7063	1.45
Oct-98	8230	0.98
Nov-98	8733	1.17
Dec-98		
Average		1.19

Measurement No. 1	NON-MECHANIZED: BUSINESS	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	413	1.46
Apr-98	291	1.75
May-98	415	2.73
Jun-98	786	2.13
Jul-98	1045	1.83
Aug-98	819	1.92
Sep-98	507	2.39
Oct-98	424	2.17
Nov-98	382	2.07
Dec-98		
Average		2.05

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REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	NON-MECHANIZED: RESALE DESIGN	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	7	8.95
Nov-98	7	5.04
Dec-98		
Average		7.00

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REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	NON-MECHANIZED: UNE	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	11	1.58
Apr-98	7	1.71
May-98	12	1.59
Jun-98	28	0.78
Jul-98	20	2.50
Aug-98	92	2.03
Sep-98	96	1.27
Oct-98	79	1.50
Nov-98	81	3.03
Dec-98		
Average		1.78

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REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	NON-MECHANIZED: UNE W/ LNP	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	8	1.59
Apr-98	5	2.08
May-98	12	1.74
Jun-98	31	2.85
Jul-98	36	1.45
Aug-98	65	2.22
Sep-98	50	1.92
Oct-98	76	2.89
Nov-98	36	3.35
Dec-98		
Average		2.23

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REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	NON-MECHANIZED: OTHER	
	CLEC AGGREGATE	
REPORTING PERIOD	Total LSRs	Avg FOC Timeliness (DAYS)
Mar-98	1725	0.68
Apr-98	1976	1.25
May-98	3304	1.23
Jun-98	3150	1.07
Jul-98	3582	1.04
Aug-98	7882	0.82
Sep-98	5342	1.26
Oct-98	3829	1.35
Nov-98	4350	1.29
Dec-98		
Average		1.11

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REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	LOCAL INTERCONNECTION TRUNKS (< 10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total ASRs	Avg FOC Timeliness (DAYS)
Mar-98	NA	NA
Apr-98	NA	NA
May-98	NA	NA
Jun-98	NA	NA
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	6	17.17
Oct-98	9	19.89
Nov-98	7	28.29
Dec-98		
Average		21.78

REPORT: AVERAGE FIRM ORDER CONFIRMATION TIMELINESS

Measurement No. 1	LOCAL INTERCONNECTION TRUNKS (> 10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total ASRs	Avg FOC Timeliness (DAYS)
Mar-98	NA	NA
Apr-98	NA	NA
May-98	NA	NA
Jun-98	NA	NA
Jul-98	4	10.75
Aug-98	6	10.33
Sep-98	9	14.00
Oct-98	10	20.80
Nov-98	12	27.17
Dec-98		
Average		16.61

NOTE: NA = Not Available, file contains no raw numbers

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REPORT: AVERAGE ORDER COMPLETION INTERVAL

Measurement No. 1	UNE DESIGN: DISPATCH(<10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98	3	45.33
Apr-98	9	10.11
May-98	12	12.00
Jun-98	16	22.00
Jul-98	55	8.73
Aug-98	57	10.86
Sep-98	64	10.97
Oct-98	93	10.19
Nov-98	62	10.68
Dec-98		
Average		15.65

Measurement No. 1	UNE DESIGN: NO - DISPATCH(<10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		
Average		

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REPORT: AVERAGE ORDER COMPLETION INTERVAL

Measurement No. 1	UNE NON - DESIGN: DISPATCH(<10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98	452	20.27
Apr-98	28	14.57
May-98	16	7.50
Jun-98	35	13.49
Jul-98	57	6.02
Aug-98	45	10.18
Sep-98	64	8.73
Oct-98	85	23.22
Nov-98	43	6.34
Dec-98		
Average		12.26

Measurement No. 1	UNE NON-DESIGN: NO DISPATCH(<10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98	9	15.00
Apr-98	1	2.00
May-98	2	11.00
Jun-98	0	0.00
Jul-98	4	5.75
Aug-98	9	4.67
Sep-98	33	1.97
Oct-98	37	7.54
Nov-98	38	10.78
Dec-98		
Average		6.52

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REPORT: AVERAGE ORDER COMPLETION INTERVAL

Measurement No. 1	UNE LOOPS WITH LNP: DISPATCH(<10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98		
Oct-98		
Nov-98		
Dec-98		
Average		

Measurement No. 1	UNE LOOP WITH LNP: NO DISPATCH(<10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98		
Oct-98		
Nov-98		
Dec-98		
Average		

NOTE: Not measured

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REPORT: AVERAGE ORDER COMPLETION INTERVAL

Measurement No. 1	UNE DESIGN: DISPATCH (> 10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98	0	0.00
Apr-98	1	17.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	1	32.00
Aug-98	1	2.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		
Average		17.00

Measurement No. 1	UNE DESIGN: NO - DISPATCH(>10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		
Average		

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REPORT: AVERAGE ORDER COMPLETION INTERVAL

Measurement No. 1	UNE NON - DESIGN: DISPATCH (>10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	1	9.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		
Average		

Measurement No. 1	UNE NON-DESIGN: NO DISPATCH(>10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98	0	0.00
Apr-98	0	0.00
May-98	0	0.00
Jun-98	0	0.00
Jul-98	0	0.00
Aug-98	0	0.00
Sep-98	0	0.00
Oct-98	0	0.00
Nov-98	0	0.00
Dec-98		
Average		

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REPORT: AVERAGE ORDER COMPLETION INTERVAL

Measurement No. 1	UNE LOOPS WITH LNP: DISPATCH (>10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98		
Oct-98		
Nov-98		
Dec-98		
Average		

Measurement No. 1	UNE LOOP W/ LNP: NO DISPATCH (>10 CIRCUITS)	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders	Avg Order Completion Time - Average Days
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98		
Oct-98		
Nov-98		
Dec-98		
Average		

NOTE: Not measured

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REPORT: AVERAGE HELD ORDER

Measurement No. 1	UNE DESIGN	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Held	Mean Interval - # of Days
Mar-98	0	0
Apr-98	0	0
May-98	1	20
Jun-98	0	0
Jul-98	1	1
Aug-98	3	24
Sep-98	5	13
Oct-98	3	49
Nov-98	2	26
Dec-98		
Average		22.17

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REPORT: AVERAGE HELD ORDER

Measurement No. 1	UNE NON - DESIGN:	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Held	Mean Interval - # of Days
Mar-98	0	0
Apr-98	0	0
May-98	0	0
Jun-98	0	0
Jul-98	0	0
Aug-98	0	0
Sep-98	0	0
Oct-98	6	33
Nov-98	4	61
Dec-98		
Average		47.00

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REPORT: AVERAGE HELD ORDERS

Measurement No. 1	UNE LOOPS WITH LNP	
	CLEC AGGREGATE	
REPORTING PERIOD	Total Orders Held	Avg Held Order Time - Average Days
Mar-98		
Apr-98		
May-98		
Jun-98		
Jul-98		
Aug-98		
Sep-98		
Oct-98		
Nov-98		
Dec-98		

Average

NOTE: Not measured

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REPORT: AVERAGE JEOPARDY INTERVAL

Measurement No. 1	RESIDENTIAL		
	CLEC AGGREGATE		
REPORTING PERIOD	Total Orders in Jeopardy	Avg Time Order is in Jeopardy (Hours/Min)	Avg Time Order is in Jeopardy (Converted to Hours)
Mar-98	NA	NA	NA
Apr-98	NA	NA	NA
May-98	6	333:44	333.73
Jun-98	5	46:08	46.13
Jul-98	5	145:18	145.30
Aug-98	20	245:51	245.85
Sep-98	27	16:41	16.68
Oct-98	8	17:45	17.75
Nov-98	4	14:17	14.28
Dec-98			
Average			117.10

Measurement No. 1	BUSINESS		
	CLEC AGGREGATE		
REPORTING PERIOD	Total Orders in Jeopardy	Avg Time Order is in Jeopardy (Hours/Min)	Avg Time Order is in Jeopardy (Converted to Hours)
Mar-98	NA	NA	NA
Apr-98	NA	NA	NA
May-98	0	0:00	0.00
Jun-98	1	5:55	5.92
Jul-98	1	24:03	24.05
Aug-98	1	5:02	5.03
Sep-98	2	2:38	2.63
Oct-98	2	27:45	27.75
Nov-98	0	0:00	0.00
Dec-98			
Average			13.08

NOTE: Jeopardy not measured until May, 1998

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REPORT: AVERAGE JEOPARDY INTERVAL

Measurement No. 1	UNBUNDLED NETWORK ELEMENTS		
	CLEC AGGREGATE		
REPORTING PERIOD	Total Orders in Jeopardy	Avg Time Order is in Jeopardy (Hours/Min)	Avg Time Order is in Jeopardy (Converted to Hours)
Mar-98	NA	NA	NA
Apr-98	NA	NA	NA
May-98	NA	NA	NA
Jun-98	NA	NA	NA
Jul-98	NA	NA	NA
Aug-98	NA	NA	NA
Sep-98	4	117:24	117.40
Oct-98	2	78:50	78.83
Nov-98	1	54.11	54.18
Dec-98			
Average			83.47

Measurement No. 1	SPECIALS		
	CLEC AGGREGATE		
REPORTING PERIOD	Total Orders in Jeopardy	Avg Time Order is in Jeopardy (Hours/Min)	Avg Time Order is in Jeopardy (Converted to Hours)
Mar-98	NA	NA	NA
Apr-98	NA	NA	NA
May-98	NA	NA	NA
Jun-98	NA	NA	NA
Jul-98	NA	NA	NA
Aug-98	NA	NA	NA
Sep-98	0	0:00	0:00
Oct-98	0	0:00	0:00
Nov-98	0	0:00	0:00
Dec-98			
Average			

NOTE: UNE and Specials not measured until September, 1998